

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LTD.,

Plaintiff,

- against -

FORIS DAX MT LTD., FORIS DAX ASIA PTE.
LTD., FORIS DAX, INC., and IRON BLOCK
CAPITAL,

Defendants.

Adv. Pro. No. 24-50188 (JTD)

**SECOND STIPULATION FOR AN EXTENSION OF TIME FOR
DEFENDANTS TO RESPOND TO COMPLAINT**

Plaintiff Alameda Research Ltd. and Defendants Foris Dax MT Ltd., Foris DAX Asia Pte. Ltd., Foris DAX, Inc. and Iron Block Capital (collectively, the “Defendants” and, together with Alameda Research Ltd., the “Parties”), by and through their respective undersigned counsel, enter into this *Second Stipulation for an Extension of Time for Defendants to Respond to Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

1. On November 7, 2024, Plaintiff initiated the above-captioned adversary proceeding by filing the *Complaint for Turnover of Assets Pursuant to 11 U.S.C. § 542 and Disallowance of Claims Pursuant to 11 U.S.C. § 502* [Adv. D.I. 1] (the “Complaint”).

2. On November 21, 2024, Foris Dax, Inc. and Iron Block Capital were served a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* [Adv. D.I. 3-4]. All Defendants have agreed to accept service of the Complaint and waive their objections, if any, to service of process.

3. On December 19, 2024, the Parties stipulated to extend the Defendants’ time respond to the Complaint until January 21, 2025. [Adv. D.I. 5, 6].

4. The Parties have conferred regarding an agreement to further extend the Defendants’ time to respond to the Complaint.

5. The Defendants’ deadline to respond to the Complaint shall be extended through February 7, 2025.

6. This Stipulation is without prejudice to the rights of the Parties to seek a further extension and/or continuance as appropriate.

7. Except for defenses relating to service of process, the Defendants reserve all rights, claims, counterclaims and defenses.

Dated: January 17, 2025

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